

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALAN DONNELLY, on behalf of himself and)	
others similarly situated,)	09 C 2264
Plaintiff,)	
)	Judge Guzman
v.)	
)	
NCO FINANCIAL SYSTEMS, INC.,)	JURY DEMANDED
Defendant.)	
)	

PARTIES' PROPOSED DISCOVERY PLAN

Alexander H. Burke for plaintiff and James Schultz and Bryan Shartle for defendant met telephonically on May 12, 2009 to discuss discovery. Pursuant to that meeting, the parties have agreed to propose the following discovery plan:

1. 26(a)(1) Disclosures Due: June 26, 2009.

2. Expert Discovery - The parties anticipate that there may be experts used in this case, both for claims and defenses, and possibly for class certification issues. They suggest that the party that bears the burden of proof for any issue shall make the first disclosure according to this schedule:

a. First disclosures: October 30, 2009;

b. Responsive disclosures: December 4, 2009;

c. Rebuttal disclosures: January 15, 2010;

3. Joinder of parties and amendments of pleadings: November 20, 2009;

4. All Discovery Cutoff: February 26, 2010.

Respectfully submitted,

/s/Alexander H. Burke
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Certificate of Service

This document was served upon the following email addresses on June 16, 2009:

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